Remedial Action Work Plan for Willow Brook and Willow Brook Pond
submitted November, 2000

General Comments:

There are four key flaws in this work plan as a conceptual work plan and/or 30% design document.

1. No specific Media Cleanup standards or general clean up goals are specified for constituents of concern other than PCBs.

2. Plans for project aspects ancillary to the remediation itself (e.g. the management of water during the project and disposal of remediation waste from the project, controls on future development, etcetera) are unclear at this time.

3. How project components will mate together is unclear (e.g. how halves of the cap will be joined, the boundary of the streambed cap with wetland remediation area, etcetera).

4. How this project will integrate and be impacted by other remediation needs at the site. Most prominent of these concerns is the ground water plume of solvents and chromium that discharges into the lower reach of willow brook within the project area.

Specific Comments:

5. Page 7, Paragraph 2: Specify if the statement "It should be noted that the contamination might have originated from multiple sources" indicates other candidate source areas are suspected or if this is a generic statement that one can never be completely sure all sources have been found. If there are specific other candidates, what are they?

6. Page 9, Paragraph 3: Clarify if the 14-16 feet below grade in the pond area means 14 to 16 feet below the bottom of the pond or 14-16 feet below ground level on the banks of the pond.

7. Page 10, Paragraph 2: Propose Media Cleanup Standards for the other constituents of concern found in the area of the proposed remediation. Although the SVOCs, metals, and petroleum hydrocarbons were not the trigger to the timing of this project. The levels of some of these constituents are quite high and we need to specify remediation goals for these ancillary contaminants.

8. Page 10, Paragraph 3: Propose a framework of institutional controls to govern the flexibility of future use this paragraph seeks to maintain. The remedy currently proposed envisions a specific future use scenario which we have anticipated will be secured by an institutional control on the area. While the alternatives discussed here might be possible the institutional control itself will have to lay out what remediation steps must be added

to change the use restrictions of any area included in the institutional control.

9. Page 13, Construction activities bullet points: 1) Clarify which oil water separator is being demolished. 2) Explain why an engineered control is needed. It was EPA's understanding that the oil/ water separator source area would be completely excavated. 3) Specify the disposal scenario for each of the waste streams itemized.

10. Provide additional information regarding the civil war marker whose relocation is proposed. There are federal statutes regarding archeological and historical resources which may have to be complied with for this marker.

11. Page 16, Paragraph 3: Expand the discussion regarding diversion of flows to explain how the restored channel halves and planned channel armoring will be mated together along the centerline of the project.

12. Page 17, Paragraph 1: Explain how water within the staging areas will be collected. No provision for a sump or other collection point has been specified.

13. Page 17, Paragraph 6: Specify the size of the stones to be used in the gabions.

14. Page 20, Project schedule bullet points: 1) Include engineering design completion as a major step. 2) Provide for interaction with EPA at each major step.

15. Page 22, Paragraph 5: Justify the sample grid size proposed, specify the composite sample detection that corresponds to a 1 ppm and 25 ppm detection in a point sample assuming adjacent points are non-detect.

16. Page 23, Paragraph 1: Provide a figure showing areal pattern of collection points for other constituents of concern and explain how sample point will be selected.

17. Page 23, Paragraph 1: Explain the sentence which reads "...submitted for analysis for metals, VOCs, SVOCs, and cyanide as necessary to determine the lateral extent of the areas to be capped. As pointed out earlier no goals for these constituents has been proposed so it is impossible to tell how the would be used as a guide to cap design. Further it was our understanding that the width of cap was predefined by the project scope we are setting (i.e. we are armoring the entire pond bottom and stream bed and providing a minimum thickness of clean soil over all upland areas excavated.).

18. Page 24, Paragraph 2: Modify disposal characterization to incorporate our knowledge about the areas we are excavating from our characterization sampling and segregate our materials handling to prevent mixing of highly contaminated sediments with relatively uncontaminated sediments.